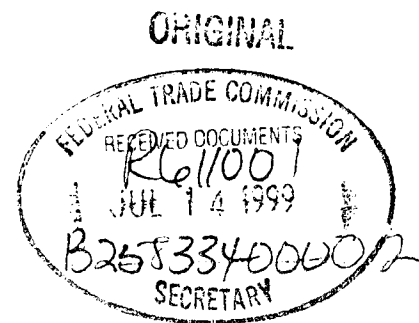


# Resthaven Memorial Gardens

July 13, 1999



Secretary  
Federal Trade Commission  
Room H-159  
600 Pennsylvania Avenue, NW  
Washington, DC 20580

Dear Sir:

I would like to respond to Issue #14.1 to the question of:

"How, if at all, since the Rule was amended, have the following factors changed?

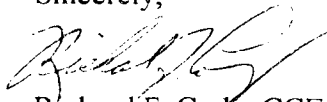
- a) the number, size, and type of providers of funeral goods and services in the industry.

**Answer:** The most compelling reason that I sold my funeral home and cemetery to a large public company was because of the existing interference and the trend toward more governmental interference in the day-to-day operations of our business. I have been in the death care industry for over forty years and have observed many of my friends in the industry similarly selling their family businesses to large public companies for the same reasons.

Most small cemeteries and funeral homes cannot afford the legal expense necessary to appeal what they perceive to be unfair governmental regulations. It would be a tremendous aid to small cemeteries if the Federal Trade commission would set up some kind of Ombudsman to arbitrate concerns of the small businesses.

I hope these comments are helpful to you in your determinations.

Sincerely,

  
Richard F. Cody, CCE  
President

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